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9 *Attorney for Defendant Christine Shinn*

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 UNITED STATES,

13 PLAINTIFF,

14 VS.

15 CHRISTINE SHINN,

16 DEFENDANT.
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19

Case No.: CR-09-00597-JF

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE SENTENCING
HEARING

20 The United States, through its counsel Jeffrey Nedrow, and defendant Christine
21 Shinn, through her counsel, Miles Ehrlich, hereby agree and stipulate to a continuance of
22 the sentencing hearing in this case now scheduled for July 22, 2010 to a new date of
23 September 2, 2010 at 9:00 a.m.
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25 The parties agree that the following reasons exist for this continuance:
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28 STIPULATION AND ORDER TO CONTINUE SENTENCING HEARING, U.S. V. CHRISTINE SHINN, CR-09-00597-JF

The defense and the government have been attempting to resolve a complex legal issue concerning the proper calculation of loss in this case, in order to avoid the need for a evidentiary hearing before sentencing in the case. The Probation Office has now reviewed the extensive submissions provided by the parties and has provided the draft Presentence Report. The parties now require the full 35 days to prepare their responses and objections to the draft PSR, and then to submit their respective sentencing memoranda.

Accordingly, the parties agree and respectfully request that the currently scheduled sentencing hearing be vacated and that sentencing be scheduled for 9:00 a.m. on September 2, 2010. The Probation Officer has been informed of, and concurs, in this requested continuance.

Respectfully submitted,

Dated: July 16, 2010

/s/
MILES EHRLICH
Counsel for Christine Shinn

Dated: July 16, 2010

/s/
JEFFREY D. NEDROW
Assistant United States Attorney

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STIPULATION AND ORDER TO CONTINUE SENTENCING HEARING, *U.S. v. CHRISTINE SHINN*, CR-09-00597-JF

~~PROPOSED~~ ORDER

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED THAT:

The currently scheduled July 22, 2010 sentencing hearing is hereby vacated and a new sentencing hearing is hereby scheduled for 9:00 a.m. on September 2, 2010.

DATED: 7-28-10


HONORABLE JEREMY FOGEL